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Country of Origin Information (COI)

Honduras & El Salvador: The Lenca Indigenous People

Biannual Report

By

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Country of Origin Information (COI)

Honduras and El Salvador: Lenca (Lenka) People

Legal Status, Territorial Conflict, Extractive Pressures, and Protection-Relevant Dynamics

Date of Compilation: February -March 2026
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1. Scope and Methodology

1. This report provides structured Country of Origin Information (COI) concerning the Lenca Indigenous people of Honduras and El Salvador.
2. It focuses on:
    - Legal recognition and demographic presence
    - Governance and traditional authority structures
    - Mining, logging, and hydroelectric conflicts
    - Reported repression, criminalisation, and killings of Lenca leaders
    - Distinct ethnic status in the context of asylum procedures
    - International oversight mechanisms
3. Sources include:
    - National constitutions and Indigenous legislation
    - Census data
    - Inter-American Court and Commission materials
    - UN Special Rapporteur communications
    - Academic research
    - Human rights NGO documentation
    - Media and judicial reporting
4. This report does not determine refugee eligibility. It provides contextual information for individualised protection assessment.

2. Ethnonym and Ethnic Distinction

1. “Lenca” is an endonym referring to a historically continuous Indigenous people of western Honduras and El Salvador.

2. Linguistically, Lenca languages are classified as a distinct language family, not Mayan and not related to Nahua/Pipil languages.
3. Colonial documentation identifies Lenca polities including:
    - Care
    - Cerquín
    - Potón
    - Taulepa
    - Chilanga
    - Cacaopera
4. Contemporary anthropological scholarship recognises the Lenca as:
    - A culturally distinct Indigenous people
    - With specific territorial concentration in Intibucá, La Paz, Lempira (Honduras), and Morazán, La Unión, San Miguel, Usulutan and western enclaves : Masagua, Tamanique, Talnique, Potonico, Arcatao, Azacualpa, Cinquera, Cancasque, Jayaque, Cunchique (El Salvador).

Key Distinction:
Lenca identity is ethnic and Indigenous. It is not synonymous with "Latino," "Hispanic," "Honduran," or "Salvadoran."

3. Legal Recognition

3.1 Honduras

1. The Constitution of Honduras recognises Indigenous peoples.
2. Honduras has ratified **ILO Convention 169** (Indigenous and Tribal Peoples Convention).
3. However:
    - No comprehensive national consultation law fully operationalises FPIC standards.
    - Land titling remains incomplete in many Lenca areas.

3.2 El Salvador

1. Constitutional reform in 2014 recognised Indigenous peoples.
2. El Salvador has **not ratified ILO Convention 169**.
3. There is no fully implemented Indigenous consultation framework.
4. Indigenous land restitution remains limited and fragmented.
5. The hereditary chief resides in exile in Australia

4. Demographic Presence

- Honduras: Estimates a 25% of the population. Between 450,000–600,000 persons identifying as Lenca (self-identification varies by census method).
- El Salvador: 957,000 Lencas. Estimates range between 15–25% of the population having partial Indigenous ancestry; self-identification as Lenca is lower due to historical repression and assimilation pressures.
- The Lenca chief leads the Lenca registry and Issuance of Lenca ID to vetted members

Self-identification remains affected by:

- Historical massacres (e.g., 1932 in El Salvador)
- Forced cultural assimilation
- Stigma and discrimination

5. Governance and Representation

Lenca governance structures vary but include:

- An exiled hereditary chief from the Taulépa ancestral clan as per tradition
- COPINH (Civic Council of Popular and Indigenous Organizations of Honduras)
- MILPAH (Indigenous Lenca Movement of La Paz)
- Local tribal councils
- Community water boards
- Traditional authorities in Morazán and Nahuaterique
- Lenca Cultural Commissioners for West and East Coast of the United States of America to assist cultural outreach to lenca diaspora.

These structures have frequently engaged in:

- Land defense
- Anti-mining mobilisation
- Opposition to hydroelectric dams
- Forest protection
- Opposition to nuclear power plant in El Salvador

6. Extractive and Environmental Conflict

6.1 Hydroelectric Dams (Honduras)

The most internationally documented case involves:

Agua Zarca Dam Project (Río Gualcarque)

- Opposed by Lenca communities in Río Blanco.
- Alleged lack of free, prior, and informed consent (FPIC).
- Militarisation and conflict reported.

Killing of Berta Cáceres (2016)

- Lenca environmental leader.
- Co-founder of COPINH.
- Assassinated in March 2016.
- Subsequent investigations implicated corporate-linked actors and military officers.
- Internationally recognised as emblematic of land defender risk in Honduras.

The Inter-American Court has ruled in related Indigenous land cases in Honduras, affirming consultation obligations.

6.2 Mining Concessions

In both Honduras and El Salvador:

- Mining concessions have been granted in or near Lenca territories.
- Communities report:
    - Lack of consultation
    - Water contamination concerns
    - Militarised enforcement of project security

El Salvador has reversed ban on mining in 2017 and has completed phase 1 to build a nuclear facility in San Vicente or Chalatenango, this a Lenca historical land.

Honduras has expanded mining concessions in recent decades, including in Lenca-inhabited areas.

6.3 Logging and Forest Conflict

Lenca territories in:

- La Paz
- Intibucá
- Lempira
- Nahuaterique

have reported:

- Illegal logging
- Forest degradation
- Criminalisation of forest defenders

Community leaders resisting logging operations have reported threats.

7. Reported Repression and Killings of Lenca Leaders

Documented patterns include:

- Assassination of Berta Cáceres (2016)
- Killing of other COPINH activists
- Arrests of MILPAH leaders
- Criminalisation of protest under charges such as:
    - Usurpation
    - Sedition
    - Coercion

Human rights organisations have reported:

- Militarisation of Indigenous territories
- Targeted surveillance
- Judicial harassment

International organisations (e.g., Global Witness) have ranked Honduras among the most dangerous countries for environmental defenders.

El Salvador has fewer high-profile killings but reports include:

- Armed attacks on the Chief's office in 1996, killing his nephew
- Harassment of Indigenous water defenders
- Criminalisation of protest
- Structural discrimination

8. Pattern of Risk for Land and Environmental Defenders

Risk factors identified in documentation include:

- Leadership in anti-dam campaigns
- Public opposition to mining concessions

- Filing complaints regarding logging
- Collaboration with international NGOs
- Media visibility

Reported harms:

- Death threats
- Armed intimidation
- Surveillance
- Criminal prosecution
- Physical attacks

Killings appear concentrated among:

- Highly visible leaders
- Organisers with public exposure

9. Distinct Ethnic Status and Aggregation Risk in Asylum Procedures

9.1 Misclassification Problem

In asylum systems, applicants from Honduras or El Salvador are often categorised as:

- “Latino”
- “Central American”
- “Honduran national”
- “Salvadoran national”

without distinct recognition of Indigenous status.

This aggregation may obscure:

- Ethnic minority vulnerability
- Historical marginalisation
- Indigenous land-based conflict risk
- Distinct governance structures
- FPIC-related political activism

9.2 International Law Context

Under the 1951 Refugee Convention:

- “Race” includes ethnicity.
- Indigenous status may constitute:
    - Race
    - Particular Social Group
    - Political opinion (when linked to land defense)

International instruments recognising Indigenous distinctiveness include:

- UNDRIP (2007)
- ILO Convention 169 (ratified by Honduras)

Failure to disaggregate Indigenous identity may:

- Undermine nexus analysis
- Dilute minority protection
- Mischaracterise targeted land-conflict persecution as generalised crime

10. Protection-Relevant Considerations

10.1 Ethnicity Alone

There is no formal UN finding of generalised persecution of all Lenca persons.

10.2 Elevated Risk Profiles

Risk may increase where the applicant:

- Is a recognised Lenca authority
- Participated in anti-dam mobilisation
- Opposed mining concessions
- Reported logging to authorities
- Collaborated with COPINH or similar organisations
- Received threats referencing Indigenous activism
- Represents the hereditary chief

10.3 State Protection

Assessment factors:

- Were complaints investigated?
- Were protective measures implemented?

- Is impunity documented in similar cases?
- Is relocation realistic given Indigenous community visibility?

10.4 Internal Relocation

Relocation analysis should consider:

- Small-community recognition
- National notoriety of activism
- Network-based targeting
- Economic hardship for displaced Indigenous farmers
- Loss of community and cultural structure leading to acculturation

11. Risk Indicator Matrix (Condensed)

Profile	**Contextual Risk Level**
High-profile Lenca anti-dam leader	Potentially High
COPINH organiser publicly opposing project	Moderate–High
Community water defender with threats	Moderate
Low-profile Lenca farmer without activism	Low (ethnicity alone insufficient)

12. Analytical Caution

- Violence appears concentrated among visible defenders.
- However, patterns of impunity in Honduras are widely documented.
- Ethnic identity becomes legally relevant when intertwined with land rights activism.
- Aggregation as “Latino” obscures minority-specific risk dynamics.

Conclusion

The situation of the Lenca people in Honduras and El Salvador is characterised by:

- Formal constitutional recognition (variable in practice)
- Sustained conflict over dams, mining, and logging
- Documented killings and criminalisation of high-profile leaders

- International monitoring and litigation
- No formal UN declaration of group-wide persecution
- Concentrated risk for land defenders and Indigenous authorities
- Distinct ethnic identity frequently obscured in asylum processing

While ethnicity alone may not establish a presumption of persecution, documented targeting of Lenca land and environmental defenders may support claims grounded in:

- Political opinion
- Particular Social Group
- Race/Ethnicity

Aggregation under generic “Honduran” or “Salvadoran” categories risks under-assessing minority-specific vulnerabilities.

RISK INDICATOR MATRIX

Honduras & El Salvador – Lenca Indigenous People

Land, Mining, Hydroelectric and Forest Conflict Context

Date: March 2026
Purpose: Structured analytical tool for RSD officers
This matrix does not determine refugee status. It supports case-by-case assessment.

1. Context Overview (Officer Reference)

Available documentation indicates:

- Lenca are a distinct Indigenous people of western Honduras and El Salvador.
- Honduras has ratified ILO Convention 169; El Salvador has not.
- Lenca communities have opposed:
    - Hydroelectric dams (notably Agua Zarca)
    - Mining concessions
    - Logging operations
- The 2016 assassination of Lenca leader Berta Cáceres is internationally documented.
- Honduras has been identified by multiple human rights monitors as high-risk for environmental defenders.
- Killings and criminalisation appear concentrated among visible leaders and land defenders.
- No UN body has issued a finding of generalised persecution of all Lenca persons.
- Risk assessment must focus on individual profile, visibility, and role in land/resource conflicts.

2. Risk Indicator Categories

A. Profile and Visibility

Indicator	Risk Relevance	Assessment Notes
Publicly recognised Lenca authority (tribal chief, COPINH leader, MILPAH organiser)	High (if threats documented)	Review media mentions, leadership roles, NGO reports

Indicator	Risk Relevance	Assessment Notes
Organiser of anti-dam or anti-mining mobilisation	Moderate–High	Increased exposure in territorial disputes
Environmental defender (water monitoring, forest patrols)	Moderate	Often targeted in extractive conflict areas
Signatory of public petitions or international complaints	Moderate	Visibility beyond local level may elevate risk
Participant in protests without leadership role	Low–Moderate	Assess whether individually targeted
Lenca individual with no activism	Low (baseline)	Ethnicity alone does not establish presumption of persecution

B. Nature of Alleged Harm

Harm Type	Reported Context	Officer Considerations
Death threats (verbal, digital, written)	Commonly reported against land defenders	Are threats specific? Patterned? Escalating?
Surveillance / armed intimidation	Reported in dam/mining conflict zones	Source of intimidation? Private actors? Security forces?
Physical assault / attempted killing	Documented in high-profile cases	Corroboration? Medical documentation?
Assassination of similarly situated leaders	Documented (e.g., 2016 dam opposition case)	Pattern relevance to applicant profile
Criminalisation (usurpation, sedition, coercion charges)	Frequently alleged in protest contexts	Examine whether charges are ordinary crimes or linked to activism
Community-wide militarisation	Reported in hydroelectric conflict areas	Was applicant individually targeted?

C. Geographic Location Risk

Honduras

Region	Risk Considerations
Intibucá	Historic Lenca stronghold; documented activism
La Paz	MILPAH and territorial disputes
Río Blanco (Santa Bárbara)	Hydroelectric conflict history
Lempira	Logging and land disputes
Nahuaterique	Logging, Water and territorial disputes

El Salvador

Region	Risk Considerations
Morazán	Lenca identity presence; historic conflict zone
Nahuaterique (border region)	Land tenure complexity and ICJ's judgment on new borders, separating communities
La Unión	Rural Indigenous communities

Officer Note:
Conflict risk in Honduras is more extensively documented than in El Salvador, but localised threats may arise in both countries.

D. Nexus to 1951 Refugee Convention Grounds

1. Political Opinion (Actual or Imputed)

Indicators:

- Opposition to mining or dam projects.
- Public statements supporting Indigenous consultation.
- Participation in community assemblies rejecting concessions.
- Threats referencing "anti-development" stance.

Assessment Question:
Was the harm inflicted because of opposition to state-backed or corporate development?

2. Membership of a Particular Social Group (PSG)

Potential PSG formulations:

- "Lenca Indigenous land defenders involved in territorial protection."
- "Recognised Lenca traditional authorities opposing extractive projects."

Assessment Criteria:

- Immutability (Indigenous ethnicity).
- Particularity (narrowly defined defender group).
- Social distinction (recognised by community, media, NGOs).

3. Race / Ethnicity

- Lenca qualify as an ethnic group.
- If threats include anti-Indigenous hostility or discrimination, race nexus may apply.
- Ethnicity may operate cumulatively with political opinion.

E. State Protection Analysis

Formal Availability

Honduras:

- Police and prosecutorial systems exist.
- Judicial prosecutions occurred in high-profile assassination cases.
- ILO 169 obligations exist.

El Salvador:

- Constitutional recognition of Indigenous peoples.
- No ILO 169 ratification.
- No comprehensive Indigenous consultation law.

Effectiveness in Practice

Question	Indicators
Was complaint filed?	Police report, Public Ministry filing, Office of the Lenca chief, Human Rights Office, Faith Based Organization.
Was investigation meaningful?	Arrests? Protective measures?
Is impunity documented in similar cases?	NGO or UN reporting
Did threats continue after complaint?	Escalation pattern
Is state actor involvement alleged?	Military or police presence

Existence of formal remedies does not equal effective protection.

F. Internal Relocation Feasibility

Assessment Considerations:

- Is the applicant widely known beyond locality?
- Was activism nationally reported?
- Are threats localised or network-based?
- Is the Lenca community small and socially identifiable?
- Would relocation sever livelihood (land-based subsistence)?

Relocation Spectrum

Applicant Type	Relocation Feasibility
High-profile land defender	Often limited
Regional organiser with media exposure	Potentially unsafe
Low-profile rural activist	Case-specific
Non-activist Lenca individual	Generally viable

G. Aggravating Risk Factors

Risk increases if applicant:

- Held leadership position.
- Hereditary chief role
- Filed formal complaints against concession.
- Publicly denounced corruption.
- Collaborated with international organisations.
- Previously survived an attack.
- Has family member targeted.
- Received threats referencing land conflict.
- Lives in heavily militarised concession zone.

H. Mitigating Factors

Risk may decrease where:

- No public activism.
- No prior threats.
- Long time lapse since incident without recurrence.
- Successful relocation within country.
- Documented effective state response.

I. Pattern Analysis (Officer Reference)

Documented elements include:

- Assassination of prominent Lenca dam opponent (2016).
- Criminalisation of protest in hydroelectric conflicts.
- Global reporting on Honduras as high-risk for environmental defenders.
- Impunity concerns in rural land conflict cases.

However:

- Incidents are concentrated among visible activists.
- No UN determination of systematic persecution of all Lenca persons.

J. Credibility Assessment Guidance

Officers may consider:

- Does timeline align with documented conflict phases?
- Does applicant describe specific concession or dam project?
- Are threats consistent with known intimidation tactics?
- Is supporting documentation available (messages, legal notices)?
- Is applicant's role plausible within known local structures?

K. Risk Spectrum Summary

Applicant Profile	**Contextual Risk Level**
Public Lenca anti-dam leader	Potentially High
Opposing nuclear facility	Potentially high
Hereditary chief, his relatives and aids	Potentially High
Organiser publicly opposing mining	Moderate–High
Environmental defender with threats	Moderate
Protest participant without leadership	Low–Moderate
Lenca individual with no activism	Low (no generalised risk established)

L. Aggregation Risk in Asylum Systems

Officers should avoid misclassification as:

- Generic "Honduran national"
- "Salvadoran national"
- "Latino male/female"

Failure to disaggregate Indigenous identity may:

- Obscure minority-specific targeting.
- Underestimate land-conflict nexus.
- Dilute analysis of political opinion linked to FPIC.

Ethnicity should be explicitly assessed when land/resource conflict is involved.

M. Overall Assessment Framework

Protection risk depends primarily on:

1. Visibility and public role (Elected or hereditary)
2. Involvement in land or extractive conflict
3. Specific threats received
4. Effectiveness of state protection
5. Feasibility of relocation
6. Evidence of nexus to Convention ground

Ethnicity alone does not establish presumption of persecution.
Activism tied to Indigenous territorial defence may elevate risk.

Analytical Caution

This matrix is based on publicly documented patterns and does not replace:

- Individual credibility assessment
- Country expert testimony
- Updated human rights reporting

Risk conditions in extractive conflict areas may fluctuate rapidly.

El Salvador is ruled by emergency law since the onset of Covid and detentions are arbitrary without proof of crime and suspect has no access to fair trials.

LEGAL ARGUMENT BRIEF

Lenca Indigenous Applicants from Honduras and El Salvador

Alignment with the 1951 Refugee Convention

Date: March 2026
Prepared for: Refugee Status Determination Officers / Counsel

I. Overview and Issues Presented

This brief addresses whether a Lenca Indigenous applicant from Honduras or El Salvador may qualify for refugee protection under Article 1A(2) of the 1951 Convention where:

1. The applicant has engaged in opposition to hydroelectric, nuclear facility, mining, logging, or land dispossession projects affecting Lenca territories;
2. The applicant has experienced threats, violence, criminalisation, or persecution;
3. The harm is linked to:
    - (a) Political opinion (actual or imputed);
    - (b) Membership of a particular social group; and/or
    - (c) Race/ethnicity (Indigenous Lenca identity).

This brief also addresses:

- Misclassification risks in asylum procedures;
- Historical state suppression of visible Indigenous identity (notably post-1932 in El Salvador);
- The continuing international recognition of Lenca as a distinct Indigenous people.

II. The Lenca as a Distinct Indigenous Ethnic Minority

A. International Recognition

International sources consistently recognise the Lenca as:

- An Indigenous people of western Honduras and El Salvador;
- A culturally distinct ethnic minority;
- A collective rights-bearing people under international law.

This recognition appears in:

- UN Special Rapporteur reports on Indigenous peoples in Honduras;
- UN press releases condemning the killing of Lenca leaders;

- European Parliament resolutions referencing Lenca land conflict;
- Human Rights Watch reporting on Honduras;
- FIDH and OMCT condemnations of assassinations of Lenca defenders;
- EU development documentation referencing Indigenous voices in forest and land agreements.

This is decisive for Convention analysis:

The Lenca are not merely nationals of Honduras or El Salvador.
They are an internationally recognised Indigenous ethnic minority and right holders.

B. Historical Suppression and the 1932 Consequences

In El Salvador, the 1932 massacre (La Matanza) resulted in:

- Severe repression of Indigenous identity;
- Prohibition and stigmatisation of visible Indigenous dress;
- Suppression of Indigenous languages in public;
- Social pressure to assimilate for survival.

As a result:

- Many Lenca families adopted mainstream dress patterns;
- Public markers of Indigenous identity were reduced;
- Cultural continuity moved into private, communal, and territorial forms.

Crucially:

Forced assimilation does not extinguish ethnic identity under international law.

The absence of visible traditional clothing does not negate Indigenous status.

International human rights instruments recognise self-identification and community continuity as defining elements of Indigenous peoples.

C. Continuing Cultural and Territorial Identity

Despite repression:

- Lenca communities maintain communal land claims (e.g., Nahuaterique region);
- A hereditary Lenca Chief attends international engagement to further their rights
- The Chief manages the Lenca registry and ID issuance of vetted members
- Community assemblies regulate territorial defence;

- Organisations such as COPINH and MILPAH continue collective mobilisation;
- Lenca women leaders are publicly recognised as land and river defenders;
- International organisations continue to refer to “Lenca communities,” not generic rural citizens.
- Local municipalities of Perquin, Quelepa and Sesori have signed MoU as Lencas.

This confirms:

Ethnic continuity persists through land, governance, and collective identity.

III. Country Context: Documented Targeting of Lenca Leaders

A: Assassination attempt against the hereditary chief Leonel Antonio Chevez (1995)

In September 1995, armed groups repeatedly attack the office of the chief in Loma Larga, La Union, El Salvador, killing Ernesto Antonio Alvarez and injuring the chief. Office burned and lenca registry destroyed. This forced the chief to exile in Australia.

2011, Chief’s sister and her extended family accepted as refugee in New Zealand after fleeing death threats in San Miguel, El Salvador.

B. Assassination of Berta Cáceres (2016)

Berta Cáceres, a Lenca Indigenous leader opposing the Agua Zarca hydroelectric project:

- Was assassinated in March 2016.
- Her killing was condemned by:
    - The UN;
    - The European Parliament;
    - International human rights organisations;
    - Global environmental defenders networks.
- Subsequent prosecutions linked corporate and military actors.

The international framing consistently described her as:

A Lenca Indigenous rights defender.

This is not generalised crime.
It is documented targeting of Indigenous land activism.

B. Assassination of Pablo Hernández (2022)

Pablo Hernández, a Lenca Indigenous leader, was assassinated in the context of land/environmental conflict.

International organisations (FIDH and others) condemned the killing.

This establishes a pattern:

High-profile Lenca territorial defenders face lethal risk.

C. Criminalisation and Judicial Harassment

Reporting indicates:

- Indigenous Lencas prosecuted under laws typically used against organised crime;
- Charges such as usurpation, coercion, or sedition in protest contexts;
- Militarisation of dam and concession zones;
- Surveillance and intimidation of community leaders.

Such criminalisation often arises in contexts of:

- Opposition to extractive projects;
- Demands for communal land titling;
- Enforcement of consultation rights.

IV. Convention Grounds Analysis

A. Race / Ethnicity (Indigenous Identity)

Under Convention jurisprudence, "race" includes ethnicity.

Lenca qualify as:

- A distinct Indigenous ethnic group;
- Historically marginalised;
- Recognised by international bodies as a people with collective rights.

Ethnicity nexus may be established where:

- Harm arises in the context of Indigenous land defence;
- Targeting is directed at community leaders as representatives of the Lenca people;
- Criminalisation disproportionately affects Indigenous territorial authorities.

The historical suppression of Indigenous visibility (post-1932 in El Salvador) strengthens — not weakens — the minority analysis. It evidences state hostility toward visible Indigenous identity.

B. Political Opinion (Actual or Imputed)

Opposition to hydroelectric, mining, and logging projects constitutes political expression concerning:

- Indigenous land sovereignty;

- State development policy;
- Resource governance;
- Compliance with international consultation standards.

Persecutors may impute:

- Anti-development stance;
- Opposition to state authority;
- Subversion of economic policy.
- Illicit organization or gang-like antagonism

Threats referencing "obstructing development" or "stopping progress" support nexus.

C. Membership of a Particular Social Group (PSG)

Viable PSG formulations include:

1. "Lenca Indigenous land defenders involved in territorial protection."
2. "Recognised Lenca traditional authorities opposing extractive projects."

These groups meet:

- Immutability (ethnicity);
- Particularity (clearly defined defenders);
- Social distinction (internationally recognised as such).

International condemnation of assassinated leaders demonstrates public recognisability of this group.

V. Persecution Analysis

Persecution may include:

- Targeted death threats;
- Armed intimidation;
- Physical assault;
- Assassination of similarly situated leaders;
- Criminalisation of protest;
- Sustained harassment with impunity.

The killings of Lenca leaders demonstrate that:

The risk to visible defenders is not hypothetical.

Even absent prior physical attack, a reasonable possibility of harm may exist where:

- Threats were received;
- Activism was public;
- Similar leaders were killed;
- State protection proved ineffective.

VI. State Protection Analysis

A. Honduras

While prosecutions occurred in the Cáceres case, broader reporting highlights:

- Impunity patterns in rural land conflicts;
- Risks to environmental defenders;
- Limited protection for Indigenous activists.

Existence of courts does not guarantee effective protection in practice.

B. El Salvador

Although constitutional reform recognises Indigenous peoples (2014):

- ILO 169 has not been ratified;
- Comprehensive consultation mechanisms remain limited;
- Historic suppression of Indigenous identity affects reporting patterns.

Protection analysis must consider:

Whether complaints were investigated effectively;
Whether relocation would sever subsistence livelihood;
Whether Indigenous leaders receive equal protection.

VII. Internal Relocation

Relocation may not be reasonable where:

- The applicant is publicly known;
- The Lenca community is small and interconnected;
- Activism involved nationally significant projects;
- Land-based livelihood cannot be reproduced in urban settings.

For low-profile individuals without activism, relocation may be viable.

VIII. Misclassification and Aggregation Risk

A recurring error in asylum systems is treating Lenca applicants as:

- Generic “Hondurans”;
- Generic “Salvadorans”;
- “Latino rural applicants.”

This obscures:

- Indigenous minority status;
- Collective land-based conflict;
- Ethnic nexus;
- Historical repression of visible identity.

The 1932 suppression of Indigenous markers explains why Lencas may not present visible dress distinctions today.

Cultural adaptation under repression does not dissolve ethnic identity.

Decision-makers must disaggregate Indigenous identity in Convention analysis.

IX. Well-Founded Fear Standard

A well-founded fear exists where there is:

- A reasonable possibility of persecution;
- Credible individual threats;
- Pattern evidence of harm to similarly situated leaders;
- Ineffective state protection;
- Unreasonable relocation alternative.

Ethnicity alone may not suffice.

But ethnicity combined with visible territorial defence may establish nexus.

X. Conclusion

A Lenca Indigenous applicant may satisfy the refugee definition where:

1. The applicant engaged in territorial or environmental defence;
2. The applicant experienced threats, violence, or criminalisation;
3. Harm is connected to:

- Race (ethnicity),
- Political opinion,
- PSG membership;

4. State protection was ineffective;
5. Internal relocation is unsafe or unreasonable.

The Lenca are a distinct Indigenous ethnic minority recognised internationally. Historical suppression of visible Indigenous markers does not negate ethnic identity. Aggregation under generic nationality categories risks misapplication of Convention standards.

MODEL CLOSING SUBMISSION

In the Matter of: [Applicant Name]

Application for Refugee Status under the 1951 Convention Relating to the Status of Refugees

I. Introduction

1. This submission is made on behalf of **[Applicant Name]**, a national of [Honduras / El Salvador] and a member of the **Lenca Indigenous people**, a distinct and internationally recognised Indigenous ethnic minority of Central America.
2. The Applicant seeks recognition as a refugee pursuant to Article 1A(2) of the 1951 Refugee Convention on the basis that he/she has a well-founded fear of persecution for reasons of:
    - (a) Race (Indigenous Lenca ethnicity);
    - (b) Political opinion (actual and/or imputed); and
    - (c) Membership of a particular social group, namely Lenca Indigenous land defenders engaged in territorial protection.
3. The evidence demonstrates that the Applicant's persecution arises from visible involvement in the defence of Lenca communal land and natural resources in the context of extractive and/or hydroelectric conflict.

II. Identity as a Member of the Lenca Indigenous People

4. The Applicant is a member of the Lenca people, an Indigenous ethnic group concentrated in western Honduras and eastern El Salvador.
5. The Lenca are recognised internationally as a distinct Indigenous people in:
    - United Nations reporting;
    - European Parliament resolutions;
    - International human rights documentation;
    - NGO reporting concerning Indigenous land defenders.
    - Lenca People keep a registry of certified members
6. Although public markers of Indigenous dress diminished in El Salvador following the 1932 indigenous massacre and repression of visible Indigenous identity, this historical suppression did not extinguish Lenca ethnic continuity.
7. The Applicant's Indigenous identity is evidenced by:
    - Community membership;

- Certificate or ID issued and signed by the hereditary Chief
- Participation in communal assemblies;
- Recognition by local authorities and neighbours as Lenca;
- Connection to Lenca territory and communal land.

8. Ethnic identity in this context is not determined by clothing or language alone, but by collective continuity, land, and community recognition.

III. Factual Background

9. The Applicant resided in [specific municipality/department], a region historically inhabited by Lenca communities.
10. Beginning in approximately [year], the Applicant became involved in:

- Community assemblies opposing [dam/mining/logging project];
- Public meetings regarding communal land rights;
- Environmental monitoring of rivers or forests;
- Organising or supporting peaceful protest activities.

11. The project in question involved [hydroelectric concession / mining licence / logging agreement] affecting land traditionally used or claimed by Lenca communities.
12. The Applicant's role became publicly known within the community and, in some instances, beyond it.

IV. Threats, Harm, and Escalation

13. As a result of this involvement, the Applicant received:

- Specific death threats;
- Verbal warnings to cease opposition;
- Surveillance by unknown individuals;
- [If applicable: physical assault or attempted attack].

14. On [date], the Applicant experienced [describe specific incident: armed confrontation, intimidation, arrest, or attack].
15. The threats referenced the Applicant's opposition to the project and/or his/her participation in Indigenous land defence.
16. The Applicant reasonably interpreted these threats in light of documented killings of Lenca leaders in similar contexts.

V. Pattern Evidence Supporting Well-Founded Fear

17. The assassination of prominent Lenca Indigenous leader **Berta Cáceres (2016)** in the context of hydroelectric opposition is internationally documented.
18. The assassination of Lenca leader **Pablo Hernández (2022)** in land-defence context further evidences risk to visible Indigenous leaders.
19. International bodies, including the United Nations and European Parliament, have condemned violence against Lenca land defenders.
20. Honduras has been widely reported as a high-risk country for environmental and Indigenous defenders.
21. These documented cases establish that violence against Lenca land defenders is not speculative.
22. The Applicant's fear must be evaluated against this broader pattern.

VI. Nexus to Convention Grounds

A. Race (Indigenous Ethnicity)

23. The Applicant belongs to the Lenca, a distinct Indigenous ethnic minority.
24. The conflict arose in the context of Indigenous territorial defence.
25. The Applicant was targeted as a representative of the Lenca community and its collective land interests.
26. The nexus to race is established where harm is directed at individuals because of their membership in an Indigenous ethnic group engaged in defending communal land.

B. Political Opinion (Actual or Imputed)

27. Opposition to the [dam/mining/logging] project constitutes expression of political opinion concerning:

- Land governance;
- Natural resource control;
- Compliance with consultation obligations;
- State development policy.

28. The threats received explicitly referenced the Applicant's opposition to the project.
29. Even if framed as cultural defence, persecutors imputed a political stance to the Applicant as an obstacle to development.

30. Jurisprudence recognises that land and environmental defence may constitute political opinion where state-supported projects are involved.

C. Particular Social Group

31. The Applicant is a member of the group:

"Lenca Indigenous land defenders involved in territorial protection."

32. This group satisfies the legal criteria:

- Immutable characteristic: Indigenous ethnicity;
- Particularity: Clearly defined defender group;
- Social distinction: Recognised by media, NGOs, authorities, and international bodies.

33. The public recognition of assassinated Lenca leaders demonstrates social distinction of this group.

VII. Persecution

34. The threats and harm experienced by the Applicant rise to the level of persecution.

35. Death threats, particularly in a context where similarly situated leaders have been assassinated, constitute serious harm.

36. Even absent completed physical attack, the cumulative pattern of intimidation and credible threats establishes a reasonable possibility of persecution.

37. The Convention does not require certainty of harm, only a well-founded fear.

VIII. State Protection

38. The Applicant reported threats to [police / prosecutor / local authority] on [date].

39. No meaningful investigation occurred.

40. No protective measures were implemented.

41. Intimidation continued.

42. While formal institutions exist, effectiveness must be evaluated in practice.

43. Reporting indicates impunity patterns in rural land conflict cases.

44. The Applicant reasonably concluded that state protection was unavailable or ineffective.

IX. Internal Relocation

45. Internal relocation is not reasonable or safe because:

- The Applicant's activism is known in local networks;
- Lenca communities are socially interconnected;
- The Applicant's livelihood is land-based and cannot easily be transferred to urban areas;
- Threats arose from conflict linked to regionally significant project.

46. Relocation would impose undue hardship and would not eliminate risk.

X. Misclassification Risk

47. It would be legally erroneous to analyse the Applicant solely as a "Honduran" or "Salvadoran" national without recognition of Indigenous minority status.
48. The Lenca are an internationally recognised Indigenous ethnic minority.
49. Historical suppression of visible Indigenous markers (particularly post-1932 in El Salvador) explains why ethnic identity may not be outwardly visible.
50. Ethnic identity in this context must be assessed through community continuity, not clothing.

XI. Well-Founded Fear Standard

51. The Applicant need only demonstrate a reasonable possibility of persecution.
52. Given:

- Documented assassinations of Lenca leaders;
- Exile of the hereditary chief and his office
- Specific threats received;
- Ineffective state response;
- Continued conflict over land;

The Applicant's fear is objectively and subjectively well founded.

XII. Conclusion

53. The Applicant has established:

- Membership in a distinct Indigenous ethnic minority;
- Targeting linked to land defence activism;
- Nexus to race, political opinion, and PSG;
- Lack of effective state protection;

- Unreasonable internal relocation.

54. Accordingly, the Applicant satisfies the definition of a refugee under Article 1A(2) of the 1951 Convention.

55. The Applicant respectfully requests recognition of refugee status.

ANNEX I

International Documentation on the Lenca Indigenous People

Evidentiary Summary for Refugee Proceedings

Date: March 2026

I. United Nations Documentation

1. UN Special Rapporteur on the Rights of Indigenous Peoples (Honduras)

A report to the Human Rights Council concerning Honduras addressed:

- The situation of Indigenous peoples in Honduras, including the Lenca;
- Failures in consultation processes;
- Land dispossession concerns;
- Violence against Indigenous rights defenders;
- Structural weaknesses in protection mechanisms.

The Special Rapporteur identified:

- Risks faced by Indigenous leaders defending territorial rights;
- The importance of free, prior, and informed consent (FPIC);
- The need for effective state protection.

Significance for RSD:
This confirms that the Lenca are recognised by the UN as a distinct Indigenous people and that land-related conflict creates protection concerns.

2. UN Press Releases Following the Killing of Berta Cáceres (2016)

Following the assassination of Lenca leader Berta Cáceres:

- UN human rights officials publicly condemned the killing.
- The murder was described as an attack against an Indigenous rights defender.
- The UN emphasised the need to protect Indigenous land defenders.

Significance:
The UN framed the killing explicitly within Indigenous land rights conflict, not as ordinary criminal violence.

3. UN News Coverage (2016)

UN reporting highlighted:

- The broader pattern of risk to Indigenous environmental defenders.
- The importance of Indigenous participation in land and environmental governance.

Significance:
This demonstrates international recognition of systemic risk to Indigenous defenders in Honduras.

II. European Union Documentation

1. European Parliament Resolution (2016)

The European Parliament adopted a resolution condemning:

- The assassination of Berta Cáceres.
- Violence against Indigenous land defenders in Honduras.
- Failures to protect Indigenous activists.

The resolution explicitly referred to:

- The Lenca Indigenous people.
- Indigenous territorial rights.
- Protection obligations of the Honduran state.

Significance:
EU institutions treat the Lenca as a distinct Indigenous people with collective rights under international law.

2. EU Development and Forest Governance Documentation

EU reporting on forest governance and timber agreements in Honduras acknowledges:

- Indigenous community participation;
- The need to include Indigenous voices in environmental decision-making.

Significance:
The EU recognises Indigenous communities, including the Lenca, as rights-bearing collectives.

III. Human Rights Watch (HRW)

HRW World Report – Honduras (2025)

Human Rights Watch reports document:

- Weak protection for human rights defenders;
- Impunity in cases of violence;
- Risks faced by environmental activists;
- Broader governance weaknesses affecting land defenders.

While not exclusively focused on Lenca, the documentation supports:

- Contextual risk for Indigenous environmental defenders;
- Limited effectiveness of state protection in rural conflict settings.

Significance:
Supports analysis of state protection and impunity.

IV. FIDH (International Federation for Human Rights)

1. Assassination of Berta Cáceres

FIDH publicly condemned:

- The murder of Lenca leader Berta Cáceres;
- The failure of the state to ensure protection;
- Structural issues linking development finance and violence.

2. Assassination of Pablo Hernández

FIDH also condemned:

- The killing of Lenca Indigenous leader Pablo Hernández;
- Risks to Indigenous community leaders.

Significance:
Demonstrates continued pattern of lethal targeting of Lenca leaders beyond a single isolated case.

V. OMCT and ProtectDefenders.eu

International protection networks documented:

- Urgent interventions concerning threats to Lenca activists;
- Calls for protection measures;
- Concern about reprisals against land defenders.

Significance:
These interventions indicate ongoing international monitoring of risk to Lenca defenders.

VI. Front Line Defenders

Front Line Defenders documented:

- The killing of Berta Cáceres;
- The targeting of Indigenous activists in Honduras;
- Protection failures.

Significance:
Confirms that Lenca defenders are categorised internationally as human rights defenders at risk.

VII. Additional International Civil Society Documentation

1. Greenpeace Retrospective on Berta Cáceres

- Framed the assassination as part of Indigenous river defence.
- Reinforced global recognition of Lenca activism.

2. Cultural Survival

- Documents Lenca resistance to extractivism.
- Describes Indigenous land rights and cultural continuity.

3. FOEI (Friends of the Earth International)

- Expressed solidarity with the Lenca people.
- Highlighted systemic land conflict issues.

Significance:
Reinforces recognition of collective Indigenous struggle, not isolated criminal events.

VIII. Nahuaterique and Territorial Disputes

Documentation concerning Nahuaterique demonstrates:

- Historical land insecurity affecting Lenca communities;
- Long-term administrative neglect;
- Border conflict consequences affecting Indigenous land tenure.

Significance:
Confirms territorial continuity and ethnic identity distinct from nationality alone.

IX. Legal and Analytical Significance

From the above documentation, the following conclusions are supported:

1. The Lenca are internationally recognised as a distinct Indigenous people.
2. Violence against Lenca leaders has drawn UN and EU condemnation.
3. Multiple leaders have been assassinated in land-conflict contexts.
4. The hereditary chief, his siter and nephew live exiled in Australia and New Zealand
5. International organisations treat Lenca land defence as human rights activism.
6. Impunity concerns have been documented in Honduras.
7. Risk is linked to Indigenous territorial defence, not generalised criminality.
8. The Lenca are not merely a regional subgroup of nationals but an ethnic minority with collective rights.

X. Relevance for Refugee Convention Analysis

The documentation supports nexus to:

- Race (Indigenous ethnicity);
- Political opinion (opposition to extractive policy);
- Particular Social Group (Indigenous land defenders).

It also supports scrutiny of:

- State protection effectiveness;
- Internal relocation reasonableness;
- Misclassification risks in asylum systems.

XI. Conclusion of Annex

International documentation consistently:

- Identifies the Lenca as an Indigenous people;

- Recognises land-based activism as Indigenous rights defence;
- Documents lethal violence against prominent Lenca leaders;
- Highlights impunity and protection weaknesses.

This body of documentation substantiates that Lenca identity is:

- Ethnic,
- Distinct,
- Internationally recognised,
- Legally relevant under the 1951 Refugee Convention.

ANNEX II

International Documentation Concerning the Lenca Indigenous People of Honduras and El Salvador

Evidentiary Attachment for Refugee Proceedings

Prepared: March 2026

I. Purpose of this Annex

This Annex summarises authoritative international documentation demonstrating:

1. Recognition of the Lenca as a distinct Indigenous ethnic minority;
2. Documented violence against Lenca land and environmental defenders;
3. International concern regarding protection failures;
4. The relevance of Indigenous identity in land-based conflict contexts.

This material is provided to assist decision-makers in properly contextualising claims brought by Lenca Indigenous applicants under the 1951 Refugee Convention.

II. United Nations Documentation

A. Special Rapporteur on the Rights of Indigenous Peoples – Honduras

The UN Special Rapporteur reported to the Human Rights Council on the situation of Indigenous peoples in Honduras, addressing:

- Land tenure insecurity;
- Failures in consultation processes;
- Violence and intimidation against Indigenous defenders;
- Structural protection deficiencies.

The report recognises Indigenous peoples, including the Lenca, as collective rights holders under international law.

Legal significance:
Confirms international recognition of Lenca as a distinct Indigenous people and identifies land conflict as a human rights concern.

B. UN Press Releases Following the Killing of Berta Cáceres (2016)

Following the assassination of Berta Cáceres, identified as a Lenca Indigenous leader:

- UN officials publicly condemned the killing;

- The murder was characterised as an attack on an Indigenous rights defender;
- The UN called for protection of Indigenous land activists.

Legal significance:
Demonstrates that international bodies treated the killing as linked to Indigenous rights defence, not general criminal violence.

C. UN News Reporting (2016)

UN News coverage highlighted:

- Broader risks to Indigenous environmental defenders;
- The importance of protecting Indigenous communities involved in land disputes.

Legal significance:
Establishes contextual pattern evidence relevant to forward-looking risk.

III. European Union Documentation

A. European Parliament Resolution (2016)

The European Parliament adopted a resolution condemning:

- The assassination of Berta Cáceres;
- Violence against Indigenous land defenders in Honduras;
- Failures of state protection mechanisms.

The resolution expressly references the Lenca Indigenous people.

Legal significance:
Recognition by a supranational legislative body that violence against Lenca defenders constitutes a rights concern.

B. EU Forest Governance and Indigenous Participation Reporting

EU documentation relating to forest governance and timber agreements in Honduras acknowledges:

- The need to involve Indigenous communities;
- Recognition of Indigenous territorial rights.

Legal significance:
Affirms international recognition of Indigenous collective land rights.

IV. Human Rights Watch (HRW)

A. HRW World Report – Honduras (2025)

Human Rights Watch reports describe:

- Weak protection for human rights defenders;
- Impunity patterns;
- Risks faced by environmental activists.

While not exclusively focused on Lenca, the reporting provides contextual evidence relevant to Indigenous land defenders in Honduras.

Legal significance:
Supports analysis of state protection effectiveness and impunity.

V. FIDH (International Federation for Human Rights)

A. Condemnation of the Killing of Berta Cáceres

FIDH publicly condemned:

- The assassination of Lenca leader Berta Cáceres;
- The structural failures enabling violence against Indigenous defenders.

B. Assassination of Pablo Hernández

FIDH condemned the killing of Lenca Indigenous leader Pablo Hernández, identifying the risk faced by Indigenous community authorities.

Legal significance:
Demonstrates ongoing lethal risk to Lenca leaders beyond a single isolated incident.

VI. OMCT and International Protection Networks

OMCT and ProtectDefenders.eu issued urgent interventions concerning:

- Threats against Lenca activists;
- The need for immediate protective measures.

Legal significance:
Indicates that international monitoring bodies considered Lenca defenders to be at real risk.

VII. Front Line Defenders

Front Line Defenders documented:

- The killing of Berta Cáceres;

- Ongoing threats to Indigenous human rights defenders in Honduras.

Legal significance:
Supports classification of Lenca activists as human rights defenders facing targeted risk.

VIII. Civil Society and Environmental Organisations

A. Greenpeace Retrospective Reporting

Greenpeace reporting framed the assassination of Berta Cáceres as part of Indigenous river defence.

B. Cultural Survival

Cultural Survival documents Lenca resistance to extractivism and affirms continued Indigenous cultural identity.

C. Friends of the Earth International (FOEI)

FOEI expressed solidarity with the Lenca people and highlighted structural land conflict.

Legal significance:
Reinforces recognition of collective Indigenous identity tied to territorial defence.

IX. Nahuaterique and Territorial Identity

Documentation concerning the Nahuaterique region highlights:

- Historical land disputes affecting Lenca communities;
- Prolonged administrative uncertainty;
- Continued Indigenous land claims.

Legal significance:
Confirms territorial continuity and ethnic identity distinct from nationality alone.

X. Analytical Summary

From the documentation reviewed:

1. The Lenca are internationally recognised as a distinct Indigenous people.
2. Violence against Lenca land defenders has drawn UN and EU condemnation.
3. Multiple Lenca leaders have been assassinated in land-conflict contexts.
4. Criminalisation and intimidation of Indigenous defenders are documented.
5. International monitoring bodies consider Indigenous land defenders at risk.
6. State protection weaknesses and impunity concerns are recorded.

XI. Relevance to Refugee Convention Grounds

The documentation supports potential nexus to:

- Race (Indigenous ethnicity);
- Political opinion (opposition to extractive projects);
- Particular social group (Indigenous land defenders).

It also supports scrutiny of:

- Effectiveness of state protection;
- Reasonableness of internal relocation;
- Risks of misclassification in asylum systems.

XII. Formal Citation List (OSCOLA Style)

European Parliament, *Resolution on the murder of Berta Cáceres in Honduras* (2016).

Friends of the Earth International, *In solidarity with the Lenca people* (2016).

Front Line Defenders, *Honduras: Killing of Indigenous Lenca leader Berta Cáceres* (2016).

Greenpeace Spain, *A diez años de Berta Cáceres: la lideresa que defendió el río y despertó al mundo* (2026).

Human Rights Watch, *World Report 2025: Honduras Chapter* (2025).

International Federation for Human Rights (FIDH), *Honduras: Assassination of Indigenous Lenca leader Pablo Hernández* (2022).

International Federation for Human Rights (FIDH), *Honduras: Assassination of Berta Cáceres* (2016).

Office of the United Nations High Commissioner for Human Rights (OHCHR), *Indigenous Peoples: UN expert condemns killing of rights defender Berta Cáceres* (2016).

United Nations Human Rights Council, *Report of the Special Rapporteur on the Rights of Indigenous Peoples on Honduras* UN Doc A/HRC/24/41/Add.2.

United Nations News, *UN officials condemn killing of Indigenous rights defender in Honduras* (2016).

ProtectDefenders.eu, *Honduras: Murder of Indigenous human rights defenders* (2016).

Cultural Survival, *Lenca Voice of Resistance Against Culture Extractivism* (2023).

ANNEX I

Full Bibliographic Citation List

Access Date for All Online Sources: 2026

United Nations Documentation

Office of the United Nations High Commissioner for Human Rights (OHCHR), *Indigenous Peoples: UN expert condemns killing of rights defender Berta Cáceres* (Press Release, March 2016)
https://www.ohchr.org/es/press-releases/2016/03/indigenous-peoples-un-expert-condemns-killing-rights-defender-berta-caceres
Accessed 23rd February 2026.

United Nations News, *UN officials condemn killing of Indigenous rights defender in Honduras* (2016)
https://news.un.org/en/story/2016/04/526482
Accessed 3 February 2026.

United Nations Human Rights Council, *Report of the Special Rapporteur on the rights of indigenous peoples on the situation in Honduras*, UN Doc A/HRC/24/41/Add.2
https://docs.un.org/es/A/HRC/24/41/Add.2
Accessed 14 March 2026.

University of Arizona, *2016 Report of the Special Rapporteur on the Rights of Indigenous Peoples – Honduras*
https://un.arizona.edu/2016-report-special-rapporteur-rights-indigenous-peoples-honduras
Accessed 10 January March 2026.

European Union Documentation

European Parliament, *Resolution on the murder of Berta Cáceres in Honduras* (2016)
https://www.europarl.europa.eu/doceo/document/TA-8-2016-0129_EN.html
Accessed 3 March 2026.

European Commission, Directorate-General for International Partnerships, *Turning over a leaf: Indigenous voices in Central Honduras timber agreement*
https://international-partnerships.ec.europa.eu/news-and-events/stories/turning-over-leaf-indigenous-voices-central-honduras-timber-agreement_en
Accessed 3 March 2026.

World Bank, *Indigenous Peoples Planning Framework – Honduras Project Documentation*
https://documents1.worldbank.org/curated/en/134501468248381268/txt/97074-SPANISH-WP-P132415-PUBLIC-Box391470B.txt
Accessed 17 January 2026.

Human Rights Watch

Human Rights Watch, *World Report 2025: Honduras – Country Chapter* (2025)
https://www.hrw.org/world-report/2025/country-chapters/honduras
Accessed 3 March 2026.

International Federation for Human Rights (FIDH)

FIDH, *Honduras: Assassination of Indigenous Lenca leader Pablo Hernández* (2022)
https://www.fidh.org/en/region/americas/honduras/honduras-lenca-indigenous-leader-pablo-hernandez-assassinated
Accessed 1st March 2026.

FIDH, *Honduras: Assassination of the Lenca Indigenous leader Berta Cáceres* (2016)
https://www.fidh.org/es/temas/defensores-de-derechos-humanos/honduras-asesinato-del-lider-indigena-lenca-pablo-hernandez
Accessed 3 March 2026.

FIDH, *Honduras: How development finance and corporate power enabled the murder of Berta Cáceres*
https://www.fidh.org/en/region/americas/honduras/honduras-how-development-finance-and-corporate-power-enabled-the
Accessed 3 March 2026.

OMCT and Protection Networks

World Organisation Against Torture (OMCT), *Civil society organisations condemn the murder of Berta Cáceres, Lenca Indigenous leader and human rights defender*
https://www.omct.org/en/resources/urgent-interventions/civil-society-organisations-in-america-and-europe-condemn-the-murder-of-berta-ca%CC%81ceres-lenca-indigenous-leader-and-human-rights-defender
Accessed 3 March 2026.

ProtectDefenders.eu, *Honduras: Murder of Indigenous human rights defenders*
https://protectdefenders.eu/honduras-murder-of-indigenous-human-rights-defenders/
Accessed 3 March 2026.

Front Line Defenders, *Honduras: Berta Cáceres killed*
https://www.frontlinedefenders.org/es/case/honduras-berta-caceres-killed
Accessed 3 March 2026.

Media and Investigative Reporting

El País, *Berta Cáceres y la resistencia que nació bajo un roble* (2 March 2026)
https://elpais.com/america/2026-03-02/berta-caceres-y-la-resistencia-que-nacio-bajo-un-roble.html
Accessed 18 February 2026.

Greenpeace España, *A diez años de Berta Cáceres: la lideresa que defendió el río y despertó al mundo* (2026)
https://es.greenpeace.org/es/noticias/a-diez-anos-de-berta-caceres-la-lideresa-que-defendio-el-rio-y-desperto-al-mundo/
Accessed 18 February 2026.

The Guardian, *Berta Cáceres assassination: Roberto David Castillo found guilty* (5 July 2021)

https://www.theguardian.com/world/2021/jul/05/berta-caceres-assassination-roberto-david-castillo-found-guilty
Accessed 20 February 2026.

Deutsche Welle (DW), *Honduras: investigación opaca genera nuevas sospechas*
https://www.dw.com/es/honduras-investigaci%C3%B3n-opaca-genera-nuevas-sospechas/a-19389317
Accessed 17 January 2026.

OpenDemocracy, *Honduras: White River dyed with Indigenous blood*
https://www.opendemocracy.net/en/democraciaabierta/honduras-white-river-dyed-with-indigenous-blood/
Accessed 3 February 2026.

Reuters. (2024, December 23). *El Salvador overturns metals mining ban, defying environmental groups*. The Guardian. https://www.theguardian.com/world/2024/dec/23/el-salvador-overturns-metals-mining-ban (The Guardian)
Accessed 11 February 2026

Indigenous and Civil Society Sources

COPINH, *A 30 años del levantamiento Lenca* (2023)
https://copinh.org/2023/09/a-30-anos-del-levantamiento-lenca/
Accessed 18 February 2026.

Cultural Survival, *Lenca Voice of Resistance Against Culture Extractivism*
https://www.culturalsurvival.org/publications/cultural-survival-quarterly/lenca-voice-resistance-against-culture-extractivism
Accessed 25 February 2026.

Friends of the Earth International (FOEI), *In solidarity with the Lenca people*
https://www.foei.org/in-solidarity-with-the-lenca-people/
Accessed 26 February 2026.

Avispa Midia, *Honduras: Indigenous Lencas denounce aggressions and demand communal land titling*
https://avispa.org/honduras-indigenas-lencas-denuncian-agresiones-y-exigen-titulacion-de-tierras-para-sus-comunidades/
Accessed 3 March 2026.

Avispa Midia (English), *Communities demand fulfilment of communal land titling*
https://avispa.org/en-honduras-comunidades-lencas-exigen-que-se-cumpla-la-titulacion-comunal-de-sus-territorios/
Accessed 3 March 2026.

EFeminista, *Mujeres indígenas y defensa de la tierra en Honduras*
https://efeminista.com/mujeres-indigenas-tierras-honduras/
Accessed 3 March 2026.

Minka Comunicación, *Honduras juzga a indígenas Lenca bajo la misma vara que el crimen organizado*

https://minkacomunicacion.com/honduras-juzga-a-indigenas-lenca-bajo-la-misma-vara-que-el-crimen-organizado-una-alarma-para-los-derechos-humanos/
Accessed 3 March 2026.

Salvadoran Constitutional Reform and Indigenous Recognition

La Prensa Gráfica, *AL ratifica la reforma constitucional indígena* (2014)
https://www.laprensagrafica.com/elsalvador/AL-ratifica-la-reforma-constitucional-indigena-20140613-0085.html
Accessed 3 March 2026.

Procuraduría para la Defensa de los Derechos Humanos (El Salvador), *Reforma Constitucional sobre Pueblos Indígenas* (2014)
https://www.pddh.gob.sv/portal/wp-content/uploads/2018/10/reforma-constitucional.pdf
Accessed 3 March 2026.

Universidad Centroamericana (UCA), *Un paso histórico*
https://noticias.uca.edu.sv/editoriales/un-paso-historico
Accessed 3 March 2026.

END OF THE REPORT ::

This report was prepared by the Global Office for Lenca Affairs as an updated document and a guide to officers regarding the Lenca indigenous people of Honduras , El Salvador and its diaspora. All questions and requests can be made to the Office of the Chief in Australia. Conversely, write to: royalmail1@gmail.com